

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 3:07-cv-5944 SC

MDL No. 1917

This Document Relates to:

INDIRECT PURCHASER ACTIONS

Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, et al., No. 13-cv-05262;

Sears, Roebuck and Co. and Kmart Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 13-cv-05262;

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

Target Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514;

Best Buy Co. Inc., et al. v. Hitachi Ltd., et al., No. 11-cv-05513;

Siegel v. Hitachi, Ltd., et al., No. 11-cv-05502;

Siegel v. Technicolor SA, et al., No. 13-cv-05261;

Sharp Elecs. Corp., et al. v. Hitachi Ltd., et al., No. 13-cv-01173;

Sharp Elecs. Corp., et al. v. Technicolor SA, et al., No. 13-cv-02776;

ViewSonic Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 14-cv-02510

**DEFENDANTS' PROPOSED
PROVISIONAL SPECIAL VERDICT
FORM**

WE, THE JURY, unanimously find as follows:

1. Did Plaintiffs prove by a preponderance of the evidence the existence of a conspiracy among manufacturers of color display tubes ("CDTs") to fix the prices of CDTs?

Yes _____ No _____

If you answered "yes," proceed to Question 2 below. If you answered "no," please proceed to Question 3 below.

2. If your answer to Question 1 is yes, please specify below the time period during which the conspiracy existed.

From _____ to _____
(Month/Day/Year) (Month/Day/Year)

Answer the next question.

3. Did Plaintiffs prove by a preponderance of the evidence the existence of a conspiracy among manufacturers of color picture tubes ("CPTs") to fix the prices of CPTs?

Yes _____ No _____

If you answered "Yes," proceed to Question 4 below. If you answered "No" to both Question 3 and Question 1 above, please sign this jury verdict form and return it to the U.S. Marshal.

4. If your answer to Question 3 is yes, please specify below the time period during which the conspiracy existed.

From _____ to _____
(Month/Day/Year) (Month/Day/Year)

QUESTIONS REGARDING CDT CONSPIRACY

Answer these questions only if you answered "Yes" to Question 1 above. Otherwise, proceed to Question 10 below.

5. Did Plaintiffs prove by a preponderance of the evidence that any of the below companies voluntarily and intentionally joined and participated in the conspiracy to fix the prices of CDTs with the purpose of furthering the goals of the conspiracy?

[List Defendants/ Yes _____ No _____
Alleged Conspirators]

If you answered "yes" next to the names of at least two companies, please proceed to Question 6. If not, please sign this jury verdict form and return it to the U.S. Marshal.

6. Did any of the companies as to which you answered "Yes" in Question 5 withdraw from the CDT conspiracy, and, if so, on what date?

[List Defendants/ Alleged Conspirators] Yes _____ No _____ Date _____

Answer the next question.

7. Did any of the below Plaintiffs prove by a preponderance of the evidence that it paid higher prices than it otherwise would have paid for the purchase of CDTs, or finished products containing CDTs (e.g., monitors), as a result of the conspiracy?

Best Buy Yes _____ No _____

Circuit City Yes _____ No _____

Sears Yes _____ No _____

Kmart Yes _____ No _____

Target Yes _____ No _____

Sharp Yes _____ No _____

ViewSonic Yes _____ No _____

Answer the next question.

8. Did the Indirect Purchaser Plaintiffs prove by a preponderance of the evidence that all or virtually all class members paid higher prices than they otherwise would have paid for the purchase of CDTs, or finished products containing CDTs (e.g., monitors), as a result of the conspiracy?

Yes _____ No _____

9. Only for the Plaintiff(s) as to which you answered "Yes" for Questions 7 or 8 above, please set forth below the dollar amount by which you find that the Plaintiff was actually overcharged for CDTs or finished products containing CDTs.

In making this calculation, do not include overcharges based on purchases involving foreign commerce unless the Plaintiff proved by a preponderance of the evidence that (1) the Plaintiff purchased a CDT in the United States that was directly imported into the United States by one or more of the conspirators; OR (2) that its injuries were proximately caused by conduct that had a direct, substantial, and reasonably foreseeable effect on trade or commerce in the United States.

Best Buy Direct Purchases: \$ _____

Indirect Purchases: \$ _____

Circuit City \$ _____

Sears Direct Purchases: \$ _____

Indirect Purchases: \$ _____

Kmart Direct Purchases: \$ _____

Indirect Purchases: \$ _____

Target \$ _____

Sharp \$ _____

ViewSonic \$ _____

Indirect Purchasers \$ _____

QUESTIONS REGARDING CPT CONSPIRACY

Answer these questions only if you answered "Yes" to Question 3 above. Otherwise, please sign this jury verdict form and return it to the U.S. Marshal.

10. Did Plaintiffs prove by a preponderance of the evidence that any of the below companies voluntarily and intentionally joined and participated in the conspiracy to fix the prices of CPTs with the purpose of furthering the goals of the conspiracy?

[List Defendants/ Yes _____ No _____
Alleged Conspirators]

If you answered "yes" next to the names of at least two companies, please proceed to Question 6. If not, please sign this jury verdict form and return it to the U.S. Marshal.

11. Did any of the companies as to which you answered "Yes" in Question 5 withdraw from the CPT conspiracy, and, if so, on what date?

[List Defendants/ Yes _____ No _____ Date _____
Alleged Conspirators]

Answer the next question.

12. Did any of the below Plaintiffs prove by a preponderance of the evidence that it paid higher prices than it otherwise would have paid for the purchase of CPTs, or finished products containing CPTs (e.g., televisions), as a result of the conspiracy?

Best Buy Yes _____ No _____

Circuit City Yes _____ No _____

Sears Yes _____ No _____

Kmart Yes _____ No _____

Target Yes _____ No _____

Sharp Yes _____ No _____

ViewSonic Yes _____ No _____

Answer the next question.

13. Did the Indirect Purchaser Plaintiffs prove by a preponderance of the evidence that all or virtually all class members paid higher prices than they otherwise would have paid for the purchase of CPTs, or finished products containing CPTs (*e.g.*, televisions), as a result of the conspiracy?

Yes _____ No _____

14. Only for the Plaintiff(s) as to which you answered "Yes" for Questions 7 or 8 above, please set forth below the dollar amount by which you find that the Plaintiff was actually overcharged for CPTs or finished products containing CPTs.

In making this calculation, do not include overcharges based on purchases involving foreign commerce unless the Plaintiff proved by a preponderance of the evidence that (1) the Plaintiff purchased a CPT in the United States that was directly imported into the United States by one or more of the conspirators; OR (2) that its injuries were proximately caused by conduct that had a direct, substantial, and reasonably foreseeable effect on trade or commerce in the United States.

Best Buy Direct Purchases: \$ _____

Indirect Purchases: \$ _____

Circuit City \$ _____

Sears Direct Purchases: \$ _____

Indirect Purchases: \$ _____

Kmart Direct Purchases: \$ _____

Indirect Purchases: \$ _____

Target \$ _____

Sharp \$ _____

ViewSonic \$ _____

Indirect Purchasers \$ _____

1 **WHEN THE JURY HAS REACHED A VERDICT, THE FOREPERSON MUST SIGN**
2 **THIS VERDICT FORM AND SIGNAL THE U.S. MARSHAL THAT THE JURY IS**
3 **READY TO RENDER A VERDICT.**

4 Date: _____ Jury Foreperson: _____

5
6
7 Dated: November 17, 2014

8 Respectfully submitted,

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.